UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

MARIA ALEJANDRA CELIMEN SAVINO, JULIO CESAR MEDEIROS NEVES, and all those similarly situated,

Petitioners-Plaintiffs,

v.

THOMAS HODGSON, et al.,

Respondents-Defendants.

Case No. 1:20-cv-10617 WGY

DECLARATION OF OREN M.
SELLSTROM IN SUPPORT OF
MOTION FOR CLASS
CERTIFICATION

- I, Oren M. Sellstrom, declare under penalty of perjury that the foregoing is true and correct:
 - I am the Litigation Director at Lawyers for Civil Rights (LCR), a position I have held since 2015. Prior to that, I worked for 18 years at the Lawyers' Committee for Civil Rights of the San Francisco Bay Area, the last five of which I served as Legal Director. I have been a civil rights attorney and litigator for 27 years.
 - 2. LCR is a non-profit legal organization whose mission is to fight discrimination and advance equality for people of color and immigrants. We do this work primarily through impact litigation, as well as individual representation. In my position as Litigation Director, I direct the organization's litigation and supervise a team of seven Staff Attorneys.
 - 3. I have served as class counsel in numerous class actions, including *Boston Chapter*, *NAACP v. Beecher and Castro v. Beecher*, Nos. 72-3060, 73-269-PBS and No. 70-1220-W, 74-2982-C (D. Mass.) (employment class actions on behalf of Black and Latino police officers and firefighters); *Williams v. City of Antioch*,4:08-cv-02301 SBA (N.D.

- Cal.) (class action on behalf of Black Section 8 tenants targeted by municipality); and *Kincaid v. City of Fresno*, 06-cv-1445 OWW (E.D. Cal. 2008) (class action on behalf of homeless individuals whose property was taken and destroyed by municipality).
- 4. I have also litigated numerous impact cases involving complex immigration issues, including *Centro Presente et. al. v. Trump et. al.*, No. 1:18-cv-10340-DJC (D. Mass) (challenge to termination of Temporary Protected Status for Haiti, El Salvador, and Honduras); *African Communities Together et al. v. Trump et. al.*, No. 4:19-cv-10432-TSH (challenge to termination of Deferred Enforced Departure for Liberians); and *Ryan et al v. Immigration and Customs Enforcement et al.*, No. 1-19-cv-11003-IT (D. Mass) (challenge to immigration enforcement in and around Massachusetts courthouses). I have litigated numerous other civil rights cases as well. *See, e.g., Huot v. Lowell*, No. 1:17-cv-10895-DLC (D. Mass) (voting rights).
- 5. In addition to myself, other attorneys at LCR who are representing the Plaintiffs and the putative class in this matter include Oren Nimni and Iván Espinoza-Madrigal. Attorney Nimni has been a practicing civil rights attorney for the last 8 years. Attorney Espinoza-Madrigal is the Executive Director of LCR and has been a practicing civil rights attorney for 15 years. Both have particular expertise in immigration impact litigation.
- 6. Attorney Nimni is lead counsel for LCR on a number of the immigration cases listed above (e.g., Centro Presente v. Trump, African Communities Together v. Trump; and Ryan v. ICE). Attorney Espinoza-Madrigal has litigated numerous class actions and impact cases, both at LCR and in his prior roles as Legal Director of The Center for HIV Law and Policy (where he focused on the intersection of public health and the law), and as Staff Attorney at Lambda Legal and at the Mexican-American Legal Defense and

Education Fund (MALDEF). Representative cases include Friendly House v. Whiting

(challenge to Arizona's anti-immigrant law, SB 1070), and Northwest Austin Municipal

Utility District No. 1 v. Holder, 557 U.S. 193 (2009) (voting rights).

I, Oren Sellstrom, declare under penalty of perjury, under 28 U.S.C. 1746, and the laws of the

United States of America, that the foregoing Declaration is true and correct.

Dated: March 27, 2020

/s/ Oren M. Sellstrom

Oren M. Sellstrom

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CERTIFICATE OF SERVICE

I hereby certify that on March 27, 2020, the above-captioned document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants.

/s/ Oren M. Sellstrom